

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES INVESTOR PROTECTION CORPORATION,	:
Plaintiff-Applicant,	:
v.	:
BERNARD L. MADOFF INVESTMENT SECURITIES, LLC,	:
Defendant.	:
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In re:	:
BERNARD L. MADOFF,	:
Debtor.	:
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IRVING H. PICARD, Trustee for the Liquidation Of Bernard L. Madoff Investment Securities LLC	:
Plaintiff,	:
v.	:
STANLEY SHAPIRO, individually, as general partner of S&R Investment Co., as trustee for LAD Trust, as trustee for David Shapiro 1989 Trust, as amended, and as trustee for Leslie Shapiro 1985 Trust, as amended,	:
RENEE SHAPIRO, individually, as general partner of S&R Investment Co., as trustee for LAD Trust, as trustee for David Shapiro 1989 Trust, as amended, and as trustee for Leslie Shapiro 1985 Trust, as amended,	:
S&R INVESTMENT CO.,	:
LAD TRUST,	:
DAVID SHAPIRO, individually and as trustee for Trust f/b/o [W.P.S.] & [J.G.S.],	:

RACHEL SHAPIRO,	:
DAVID SHAPIRO 1989 TRUST, as amended,	:
TRUST F/B/O [W.P.S] & [J.G.S.],	:
LESLIE SHAPIRO CITRON ,	:
LESLIE SHAPIRO 1985 TRUST, as amended,	:
TRUST F/B/O [A.J.C.], [K.F.C.], & [L.C.C.]	:
KENNETH CITRON, individually and as trustee	:
For Trust f/b/o [A.J.C.], [K.F.C.], &[L.C.C.]	:
Defendants.	:

X

NOTICE OF MOTION TO QUASH

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 45, Stanley Shapiro, the Estate of Renee Shapiro, and S & R Investment Co, by their undersigned counsel, will move before the Honorable Jed S. Rakoff, United States District Court Judge, at the United States District Court for the Southern District of New York, 50 Pearl Street, New York, New York 10007, as soon as counsel may be heard, for an Order quashing the subpoena served by the Trustee upon non-party JPMorgan Chase Bank, N.A. dated June 26, 2017 and for such other and further relief as the Court deems just, equitable, and proper.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Stanley Shapiro, the Estate of Renee Shapiro, and S & R Investment Co. shall rely on the accompanying Memorandum of Law and the Declaration of Barry R. Lax, Esq., dated November 15, 2017, and its accompanying exhibits.

PLEASE TAKE FURTHER NOTICE that Stanley Shapiro, the Estate of Renee Shapiro, and S & R Investment Co. request oral argument if this Motion is opposed.

Dated: New York, New York
November 15, 2017

LAX & NEVILLE LLP

By:/s/ Barry R. Lax

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*Attorneys for Stanley Shapiro, the Estate of
Renee Shapiro, and S & R Investment Co.*